



CRUMILLER P.C.

January 13, 2023

VIA ECF

Hon. John G. Koeltl
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007


RE: *Samaka Ndege v. Skanska USA Building Inc.* – Case No. 22-CV-04420 (JGK)

Dear Judge Koeltl,

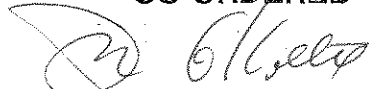
This Firm represents Plaintiff in the above-captioned employment discrimination matter. We write jointly with defense counsel in accordance with Your Honor's Individual Practices, 1(E), to request an extension of time for the deadline to file an electronic discovery protocol, from January 13, 2023, to February 12, 2023. This is the first time the Parties have requested an extension of this deadline. The Parties are currently negotiating a draft agreement and need additional time to finalize it.

We thank the Court in advance for its consideration of this letter motion.

Sincerely,


Travis Pierre-Louis

APPLICATION GRANTED
SO ORDERED



John G. Koeltl, U.S.D.J.

1/13/23